

**Travis England**

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**From:** Quinn, Robert E <rquinn@ch.ci.buffalo.ny.us>  
**Sent:** Wednesday, March 6, 2019 9:16 PM  
**To:** Claudia Wilner; Travis England; Darius Charney  
**Subject:** RE: BLRR v City of Buffalo  
**Attachments:** DOC030619-03062019194414.pdf; DOC030619-03062019194516.pdf; DOC030619-03062019215044.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

All,

Second Supplemental response is in the mail to you and I will hand delivery to WNY Law Center tomorrow. Cover letter is attached. We have not yet completed search for ESI and we should discuss that. It is now my understanding that BPD uses a "lotus notes" system for emails, not Microsoft Outlook, and I would like to discuss the best way to proceed given my understanding of that system. Additionally, I would like to discuss both the requests for "Strike Force Daily Report" and "Housing Daily Reports". There are a few issues on these. First is that based on my review of the forms, they will likely require heavy redaction and this has led to the process taking much longer than expected. Second is the fact that we have obtained a large number of those documents in hard copy, two examples of which are attached, that do not contain all information due to printer/size settings. Third is whether these documents are necessary given these factors and other information that has and is being provided. On this you'll obviously want to review our responses.

To give an update more generally, since we last spoke, I have reached out to the ECC Police Academy, the BPD Training Academy, and the Internal Affairs Division, so may be able to answer more of your questions pertaining to those areas.

Also, but when we last spoke one of your team indicated they would be sending a list of the BPD forms that had been obtained/created. I may have missed it, but are you still able to send that?

I'm booked most of the day tomorrow, but should be around Friday if you have some time. Thanks.

-Rob Quinn. (716) 851-4326.

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**From:** Claudia Wilner [mailto:wilner@nclej.org]  
**Sent:** Wednesday, February 27, 2019 4:44 PM  
**To:** Quinn, Robert E <rquinn@ch.ci.buffalo.ny.us>  
**Cc:** Travis England <england@nclej.org>; Darius Charney <dcharney@ccrjustice.org>  
**Subject:** RE: BLRR v City of Buffalo

Rob, I wanted to follow up on your email below to see if you have any information to share.

In addition, I wanted to make sure we are on track for a document production on March 6. Please advise. Thanks.



**Claudia Wilner**

Senior Attorney

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